

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	Chapter 7
Robert L. Squires, Jr. a/k/a Robert L.	:	
Squires, Jr. & Jody L. Squires	:	
Debtor .	:	Case No.: 5:18-bk-00380

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Robert L. Squires, Jr. a/k/a Robert L.	:
Squires, Jr. & Jody L. Squires	:
Movant,	:
	:
v.	:
	:
Pennsylvania Department of Revenue	:
Respondent.	:

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NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE

Robert L. Squires, Jr. a/k/a Robert L. Squires, Jr. & Jody L. Squires have filed a Motion to Avoid Lien with the court for *the purposes of avoiding a lien by Pennsylvania Department of Revenue.*

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before 03/22/2018 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

274 Max Rosen U.S. Courthouse  
197 South Main Street  
Wilkes-Barre, PA 18701

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Jason M. Rapa, Esquire  
141 S. 1<sup>st</sup> Street  
Lehighton, PA 18235  
610-377-7730  
610-377-7731 – f

2. If you or your attorney file and serve an objection/response within the time permitted, the Court will schedule a hearing and you will be notified. If you do not file an objection/response within the time permitted, the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

Date: 03/01/2018